

**REMARKS:**

In the Office Action mailed August 4, 2005, the Examiner allowed claims 6, 8, 9 and 12, objected to claims 3, 7, 10 and 11 and rejected claims 1, 2, 4, 5 and 13-16. Claims 4, 5, 7, 10, 11 and 13-15 are amended herein, and new claim 17 is added. No new matter is presented. Thus, claims 1-17 are pending and under consideration. The rejections are traversed below.

**ALLOWABLE SUBJECT MATTER:**

In the outstanding Office Action, the Examiner indicated that claims 6, 8, 9 and 12 are allowed and claims 3, 7, 10 and 11 would allowable if rewritten in independent form (see, pages 2 and 8). Claims 7, 10 and 11 have been amended to be in independent form, and the rejection of claim 1, upon which claim 3 depends, is overcome as set forth below.

Therefore, it is respectfully submitted that claims 3, 7, 10 and 11 are allowable.

**CLAIM OBJECTION:**

On page 2 of the outstanding Office Action, the Examiner objected to claim 11 due to informalities. Claim 11 is amended herein to overcome the objection.

Therefore, withdrawal of the objection is respectfully requested.

**REJECTION UNDER 35 U.S.C. § 112, ¶ 2:**

On page 3 of the outstanding Office Action, the Examiner rejected claims 14 and 15 under the second paragraph of 35 U.S.C. § 112. Claims 14 and 15 are amended herein to overcome the rejection.

Therefore, withdrawal of the objection is respectfully requested.

**REJECTION UNDER 35 U.S.C. § 102(b):**

Claims 1 and 2 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,440,697 (Boegel).

Boegel is directed to simulating I/O devices based on a script defining a simulated workload associated with the I/O devices. The simulation script of Boegel indicates one or more I/O devices to be simulated including a simulated workload associated therewith, and the script describes actions to be taken by the I/O processors (IOP) to simulate the I/O devices (see, col. 2, lines 63-65 and col. 3, lines 29-42). However, Boegel is limited to simulating I/O devices

using corresponding different scripts prepared for the I/O devices (i.e., the scripts are not changeable to accommodate different types of devices).

In contrast to Boegel, the present invention simulates a device to be tested using a file that has errors of a pseudo target defined therein. That is, the file of the present invention has contents that are changeable to accommodate various devices, as needed. Specifically, independent claim 1 recites that contents of the file having a pseudo target are “changeable to accommodate various types of devices” (claim 1, lines 5-6) and “a pseudo I/O unit [processes] the command received according to set contents” (claim 1, lines 8-9).

Boegel does not teach or suggest “changeable” contents of a file that defines an error of a pseudo target to accommodate “various types of devices”, as recited in independent claim 1. Therefore, claim 1 patentably distinguishes over Boegel.

For at least the above-mentioned reasons, claims depending from independent claim 1 are patentably distinguishable over Boegel. The dependent claims are also independently patentable. For example, as recited in claim 2, “a file where information of an I/O device to be simulated is defined and set is set as the setting file”. Boegel does not teach or suggest these features of claim 2.

Therefore, withdrawal of the rejection under 35 U.S.C. § 102(b) is respectfully requested.

#### **REJECTION UNDER 35 U.S.C. § 103(a):**

Claims 4, 5, 13 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over various combinations of: Boegel and U.S. Patent No. 6,728,668 (Kitamorn) and U.S. Patent No. 6,546,507 (Coyle).

The Examiner acknowledged that Boegel does not teach making a hardware error occur if error contents are set in the setting file, but relies on Kitamorn as teaching the same. However, Kitamorn is directed to simulating errors in processors in accordance with individual error registers (202a, 204a, and 206a) for respective CPUs (202, 204, and 206); see, FIG. 2 and corresponding text.

The Examiner also relied on the combination of Boegel and Coyle. However, Coyle is limited to injecting a set of stimulus patterns on the bus and identifying an error resulting from the stimulus patterns (see, col. 4, lines 18-29).

Independent claim 13 recites, “a file where error contents of a simulation target are defined and set” (claim 13, line 3), where the contents of the file are “changeable to accommodate various types of devices” (claim 13, lines 4-5) and “a normal reply process is performed when the contents corresponding to the command are not set” (claim 13, lines 9-10).

The claimed pseudo I/O method in claim 16 includes, “setting a file having contents... changeable to accommodate various types of devices” (claim 16, lines 3-4) and “referencing the file and processing a command from the device to be tested according to the set contents in the file” (claim 16, lines 5-6). Accordingly, a hardware error is generated with respect to various types of devices “when error contents of the hardware are set in the file” (claim 16, last 2 lines). Independent claims 4 and 5 also recite that contents of the file are “changeable to accommodate various types of devices.”

Boegel, Coyle and Kitamorn, alone or in combination, do not teach or suggest setting “changeable” contents of a file and causing a set error of a protocol or a hardware error occur based on the file. Therefore, it is respectfully submitted that claims 4, 5, 13 and 16 are patentably distinguishable over the Boegel, Coyle and Kitamorn.

Therefore, withdrawal of the rejection is respectfully requested.

#### **NEW CLAIM:**

New claim 17 recites, “modifying an original file having contents of an error of a first pseudo target to be tested and setting the modified file to test a second pseudo target” (claim 17, lines 3-4), where the first and second pseudo targets are “different types of devices” (claim 17, line 5). This enables use of “the modified file in processing a command from the second pseudo target” (claim 17, line 6) without the need to develop a different file for each type of device.

The cited references, alone or in combination, do not teach or suggest the above-discussed features of claim 17. Therefore, it is respectfully submitted that new claim 17 is patentably distinguishable over the cited references.

#### **CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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